

Brian C. Rocca, S.B #221576
 brian.rocca@morganlewis.com
 Sujal J. Shah, S.B #215230
 sujal.shah@morganlewis.com
 Michelle Park Chiu, S.B #248421
 michelle.chiu@morganlewis.com
 Minna Lo Naranjo, S.B #259005
 minna.naranjo@morganlewis.com
 Rishi P. Satia, S.B #301958
 rishi.satia@morganlewis.com

MORGAN, LEWIS & BOCKIUS LLP

One Market, Spear Street Tower
 San Francisco, CA 94105
 Telephone: (415) 442-1000
 Facsimile: (415) 422-1001

Richard S. Taffet, *pro hac vice*
 richard.taffet@morganlewis.com
MORGAN, LEWIS & BOCKIUS LLP
 101 Park Avenue
 New York, NY 10178
 Telephone: (212) 309-6000
 Facsimile: (212) 309-6001

Counsel for Defendants

Glenn D. Pomerantz, S.B. #112503
 glenn.pomerantz@mto.com
 Kuruvilla Olas, S.B. #281509
 kuruvilla.olas@mto.com
 Nicholas. R. Sidney, S.B. #308080
 nick.sidney@mto.com
MUNGER, TOLLES & OLSON LLP
 350 South Grand Avenue, Fiftieth Floor
 Los Angeles, California 90071
 Telephone: (213) 683-9100

Kyle W. Mach, S.B. #282090
 kyle.mach@mto.com
 Justin P. Raphael, S.B. #292380
 justin.rafael@mto.com
 Emily C. Curran-Huberty, S.B. #293065
 emily.curran-huberty@mto.com
 Dane P. Shikman, S.B. #313656
 dane.shikman@mto.com
MUNGER, TOLLES & OLSON LLP
 560 Mission Street, Twenty Seventh Fl.
 San Francisco, California 94105
 Telephone: (415) 512-4000

Jonathan I. Kravis, *pro hac vice*
 jonathan.kravis@mto.com
MUNGER, TOLLES & OLSON LLP
 601 Massachusetts Ave. NW, Ste 500E
 Washington, D.C. 20001
 Telephone: (202) 220-1100

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

**IN RE GOOGLE PLAY STORE
 ANTITRUST LITIGATION**

THIS DOCUMENT RELATES TO:

*In re Google Play Consumer Antitrust
 Litigation*, Case No. 3:20-cv-05761-JD

State of Utah et al. v. Google LLC et al.,
 Case No. 3:21-cv-05227-JD

Case No. 3:21-md-02981-JD

**DECLARATION OF SUJAL J. SHAH IN
 SUPPORT OF ADMINISTRATIVE
 MOTION TO CONSIDER WHETHER
 ANOTHER PARTY'S MATERIALS
 SHOULD BE SEALED RE NOTICE OF
 FILING OF DECLARATION OF DR.
 GREGORY K. LEONARD**

Judge: Hon. James Donato

1 1. I, Sujal J. Shah, am an attorney at Morgan, Lewis & Bockius LLP, counsel of
 2 record for Defendants Google LLC, Google Ireland Limited, Google Commerce Ltd., Google
 3 Payment Corp., Google Asia Pacific Pte. Ltd., and Alphabet Inc. (“Defendants” or “Google”) in
 4 this multi-district litigation (MDL). I am a member in good standing of the State Bar of
 5 California and admitted to practice in the state and federal courts of California. I respectfully
 6 submit this declaration in support of Google’s Administrative Motion to Consider Whether to
 7 Seal Another Party’s Materials Relating to Google’s Notice of Filing of Declaration of Dr.
 8 Gregory K. Leonard In Response to Court’s Order Re Dr. Singer’s Proposed Expert Testimony
 9 and the related materials filed in support of that motion (“Notice of Filing”).

10 2. I submit this declaration pursuant to Civil Local Rule 79-5. The contents
 11 of this declaration are based on my personal knowledge. If called upon as a witness in
 12 this action, I could and would testify competently thereto.

13 3. The accompanying exhibit to Google’ Notice of Filing contains portions that are
 14 sourced from materials that (on behalf of non-parties) have been designated as “NON-PARTY
 15 HIGHLY CONFIDENTIAL – OUTSIDE COUNSEL EYES ONLY”, pursuant to the operative
 16 Protective Orders entered by the Court, Case No. 3:21-md-02981-JD, ECF Nos. 247, 248, and
 17 249. The following table shows the portions of Exhibits that contain information designated as
 18 “NON-PARTY HIGHLY CONFIDENTIAL – OUTSIDE COUNSEL EYES ONLY”.

Document	Portion Containing Designated Information	Designating Party
Exhibit 1	Page 13, Paragraph 19 (between “shares of” and “respectively as of”)	Rosetta Stone, Duolingo, and PictureThis
Exhibit 1	Page 13, Paragraph 19 (between “Duolingo (” and “versus”)	PictureThis
Exhibit 1	Page 13, Paragraph 19 (between “versus” and “) simply”)	Duolingo
Exhibit 1	Page 13, Paragraph 19 (between “Rosetta Stone (versus” and “as predicted by”)	PictureThis

Document	Portion Containing Designated Information	Designating Party
Exhibit 1	Page 13, Paragraph 19, Table (all figures under “Category Share” and “Logit Model’s Assumption Regarding Percentages of Switching from ‘Rosetta Stone’ to ‘Duolingo’ and ‘PictureThis – Plaintiff Identifier’” columns)	Rosetta Stone, Duolingo, and PictureThis

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 14th day of August 2023 in San Francisco, California.

s/ Sujal J. Shah
Sujal J. Shah